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CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

October 18, 2019

The Honorable Herb J. Wesson, Jr.
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
Room 360, City Hall

**BRIDGE HOUSING ON 3210 AND 3248 W. RIVERSIDE DR. (CF-19-0126)
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICE OF EXEMPTION**

Dear President Wesson and Honorable Members:

On March 29, 2019, the City Council adopted a motion instructing City staff to evaluate and report on the feasibility of establishing temporary bridge housing at 3210 and 3248 West Riverside Drive in Council District 4. The Bureau of Engineering has conducted a CEQA analysis of the proposed development and lease of the site for use as A Bridge Home for those experiencing homelessness.

RECOMMENDATION

Staff recommends that Council determine the Bridge Home Project on 3210 and 3248 West Riverside Drive, which allows the development and lease of the property as temporary shelter for those experiencing homelessness, is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to mitigate an emergency as also reflected in CEQA Guideline Section 15269(c) and in the City's CEQA Guidelines Article II, Sections 2.a(3) and h. Please refer to the attached notice.

If you have any questions, please contact Allan Kawaguchi at (213) 485-4687.

Sincerely,

Electronically signed by 21086 on 10/18/2019 at 3:53:15 PM

Gary Lee Moore, PE, ENV SP
City Engineer

GLM/AK/mem

Q:\GLM\City Engineer\GLM Signed Documents\2019 Documents\Transmittal to Council
Riverside Drive Bridge Housing NOE.doc

Attachment



COUNTY CLERK'S USE

**CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL**

CITY CLERK'S USE

**LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III – City CEQA Guidelines)**

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering, 1149 S. Broadway, MS 939, Los Angeles, CA 90015	COUNCIL DISTRICT 04
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PROJECT TITLE: CD 04 Riverside Dr Bridge Housing Facility	LOG REFERENCE C.F. No. 19-0126
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PROJECT LOCATION: 3210 and 3248 West Riverside Drive, Los Angeles, CA 90027	T.G. 594 C2
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DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT The proposed Project is the construction of a temporary homeless shelter within the Alquist-Priolo Earthquake Fault Zone that will consist of a temporary change in use from a City of Los Angeles Department of Recreation and Parks (City)-owned parcel to an *A Bridge Home* emergency homeless shelter. The County of Los Angeles will lease and operate the facility for up to 3 years. The Proposed Project also includes a fault investigation that includes archaeological and/or paleontological monitoring to determine the location of active fault trace(s) on the site. The nature of this project is to serve the local homeless community in order to provide access to emergency shelter, hygiene, storage, food services and case management. The purpose of the project is to provide emergency shelter for the homeless to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing; and to collect information and data. The site property is located at 3210 and 3248 Riverside Drive, Los Angeles, CA 90027, as shown in *Figure 1 – Project Site Location*. The Project location is a partially developed and improved parcel that is approximately 3.3 acres and is comprised of two (2) lots with two Assessor Parcel Numbers (APN) including 5434-016-900 and 5434-016-901. The project site is approximately 28,500-square feet (sf) of the total parcel area and is proposed to be generally situated on an existing surface parking lot that currently has 56 parking spaces. The City-owned lot is located in the City of Los Angeles Council District 4 in the Hollywood Community Plan Area. The project design includes a total of approximately 28,500-sf; up to a 10,800 square-foot (sf) tent structure with approximately 100 beds, an approximately 1,080-sf hygiene trailer, an approximately 1,080-sf administration/intake trailer, a repose garden, bin storage area, waste and recycling area, an approximately 3,500-sf of elevated deck with stairs and ramps, an approximately 680-sf outdoor pet area and general open space that would serve the local homeless community. There will be no parking. New utilities including water, electrical and sewer lines will be added and approximately 700-linear-feet of onsite fencing are also included in the project. Up to five trees will be removed. The project site is located within the south east portion of Griffith Park, a City of Los Angeles Historical Cultural Monument within the Loz Feliz community just southeast of the intersection of Riverside Drive and Los Feliz Boulevard; on the west side of Riverside Drive. The project site is 2.2 miles southeast of the Griffith Observatory. The project location is within the Alquist-Priolo Earthquake Fault Zone and is required to comply with surface fault rupture investigation requirements by City of Los Angeles Department of Building and Safety. Standard conditions, including a construction management plan incorporated into the project design, will apply. The proposed project is 300-ft south of the Hollywood Fault Zone. The project will have a 25-ft setback from the southern boundary of the fault zone for the proposed habitable structures at the site. The project will not significantly impact environmental resources. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details)

CONTACT PERSON: Maria Martin	TELEPHONE NUMBER: 213-485-5753
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EXEMPT STATUS: (Check One)	CITY CEQA GUIDELINES	STATE CEQA GUIDELINES	CA PUBLIC RESOURCES CODE
<input type="checkbox"/> MINISTERIAL	Art. II, Sec. 2.b	Sec. 15268	
<input type="checkbox"/> DECLARED EMERGENCY	Art. II, Sec. 2.a(1)	Sec. 15269(a)	
<input type="checkbox"/> GENERAL EXEMPTION	Art. II, Sec. 1	Sec. 15061(b)(3)	
<input type="checkbox"/> CATEGORICAL EXEMPTION*	Art. III, Sec. 1	Sec. 1530_	
<input checked="" type="checkbox"/> STATUTORY	Art. II Secs. 2.a(3) & h	Sec. 15269 (c)	21080(b)(4)

JUSTIFICATION FOR PROJECT EXEMPTION: This project is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to mitigate an emergency as also reflected in CEQA Guideline Section 15269(c) and in the City's CEQA Guidelines as provided above.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Group	DATE:
FEE: \$75.00 _____	RECEIPT NO.	REC'D BY
		DATE

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The proposed Project is the construction of a temporary homeless shelter within the Alquist-Priolo Earthquake Fault Zone that will consist of a temporary change in use from a City of Los Angeles Department of Recreation and Parks (City)-owned parcel to an *A Bridge Home* emergency homeless shelter. The County of Los Angeles will lease and operate the facility for up to 3 years. The Proposed Project also includes a fault investigation that includes archaeological and/or paleontological monitoring to determine the location of active fault trace(s) on the site. The nature of this project is to serve the local homeless community in order to provide access to emergency shelter, hygiene, storage, food services and case management. The purpose of the project is to provide emergency shelter for the homeless to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing; and to collect information and data. The site property is located at 3210 and 3248 Riverside Drive, Los Angeles, CA 90027, as shown in *Figure 1 – Project Site Location*.

The Project location is a partially developed and improved parcel that is approximately 3.3 acres and is comprised of two (2) lots with two Assessor Parcel Numbers (APN) including 5434-016-900 and 5434-016-901. The project site is approximately 28,500-square feet (sf) of the total parcel area and is proposed to be generally situated on an existing surface parking lot that currently has 56 parking spaces. The City-owned lot is located in the City of Los Angeles Council District 4 in the Hollywood Community Plan Area.

The project design includes a total of approximately 28,500-sf; up to a 10,800 square-foot (sf) tent structure with approximately 100 beds, an approximately 1,080-sf hygiene trailer, an approximately 1,080-sf administration/intake trailer, a repose garden, bin storage area, waste and recycling area, an approximately 3,500-sf of elevated deck with stairs and ramps, an approximately 680-sf outdoor pet area and general open space that would serve the local homeless community. There will be no parking. New utilities including water, electrical and sewer lines will be added and approximately 700-linear-feet of onsite fencing are also included in the project. Up to five trees will be removed. The project development footprint is approximately 20% of the total project site. The project site is located within the south east portion of Griffith Park, a City of Los Angeles Historical Cultural Monument within the Loz Feliz community just southeast of the intersection of Riverside Drive and Los Feliz Boulevard; on the west side of Riverside Drive. The project site is 2.2 miles southeast of the Griffith Observatory.

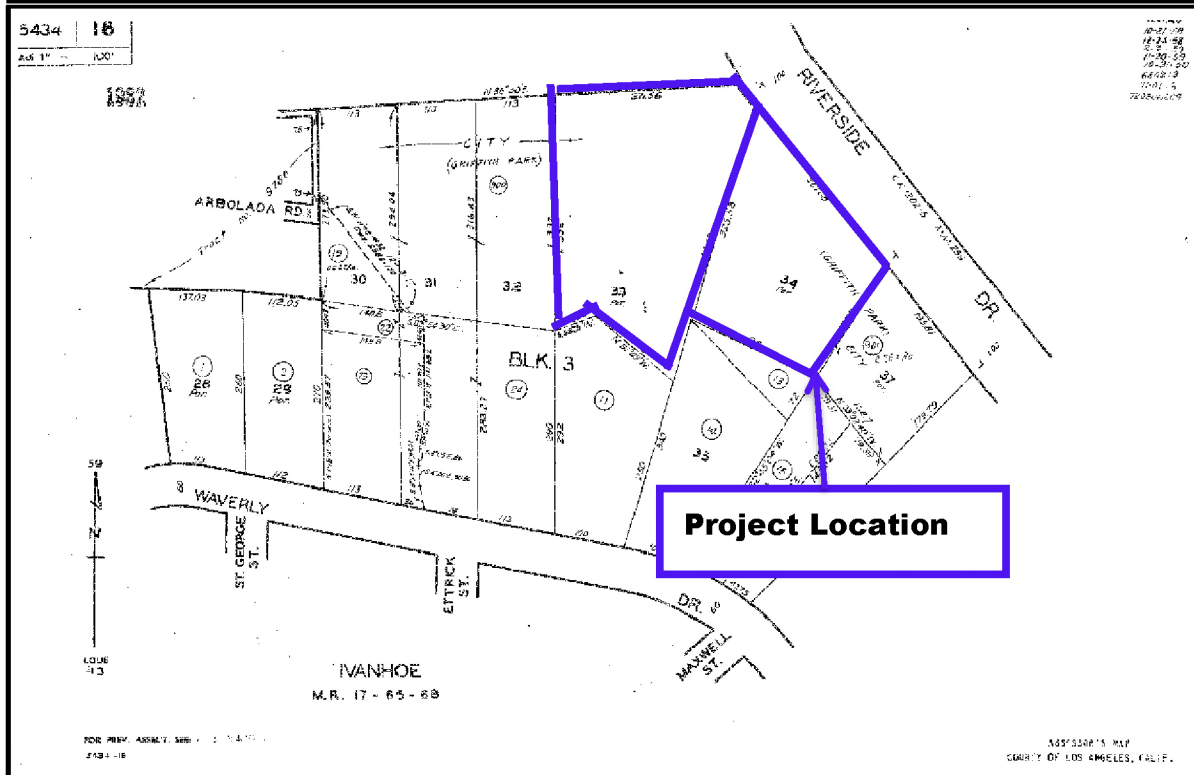
The project is located within the Alquist-Priolo Earthquake Fault Zone (APEFZ); specifically, within the Hollywood Earthquake Fault Zone in the City of Los Angeles. The Hollywood Fault line traverses through the property. Fault investigations are required by the City of Los Angeles Department of Building and Safety (DBS) for projects located within an official APEFZ and within a City of Los Angeles Preliminary Fault Rupture Study Areas (PFRSA). The PFRSA's have been established along faults considered active within the City boundaries that the California Geological Survey (CGS) has not yet zoned. The CGS has established an APEFZ for the active Hollywood Fault, part of a system of east trending reverse, oblique-slip, and left-lateral strike-slip faults that extend for 200 kilometers along the southern boundary of the Transverse Ranges. Geomorphic observations indicate that the Hollywood Fault extends for approximately 8.4 miles from the Los Angeles River area in a westerly direction along the base of the Santa Monica Mountains through downtown Hollywood to northwestern Beverly Hills. The Hollywood Fault is thought to dip steeply to the north separating Cretaceous age granitic and Eocene age sedimentary and volcanic bedrock units on the north from Quaternary age alluvial sediments to the south. The main strand of the Hollywood fault zone, as interpreted by CGS, is

located approximately 300 feet north of the proposed Riverside Bridge Home project. The DBS requires that the default building setback from an active fault is 50 feet. Reduced setbacks can be considered if the location, trend and nature of a particular fault trace are accurately established. The DBS Surface Fault Rupture Investigation findings for the Project include a required 25-ft setback from the southern boundary of the fault zone for the proposed habitable structures at the site.

Figure 1 – Project Site Location



FIGURE 2 – Assessor's Parcel Map



Standard conditions, including a construction management plan incorporated into the project design, will apply. The project design shall comply with a construction management plan that includes project design conditions, as necessary, to protect the health, safety, or convenience of affected sensitive receptors, located in the neighborhood that surrounds the project. The construction management plan and appropriate design conditions have been selected from the *City of Los Angeles, Bureau of Engineering, Master Specifications, Division 01, General Requirements, Section 01562, Part 1.1.C*. Selected design conditions are detailed further under applicable resource area analyses (Reference 1). Further, a performance-based approach for developing seismic design features will allow the Department of Building to apply a more direct, non-prescriptive approach to the final design, as necessary. In addition, unless otherwise stated, the proposed project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards including but not limited to:

- Los Angeles Municipal Code
- Bureau of Engineering Standard Plans
- Standard Specifications for Public Works Construction
- Work Area Traffic Control Handbook
- Additions and Amendments to the Standard Specifications for Public Works Construction
- Department of Recreation and Parks Trees Protection Specifications.

II. PROJECT HISTORY

The presence of the unsheltered homeless population and their homeless encampments has increased over the last year by 16%. Because of this, in some areas of the city, access to public places, access routes, and businesses has been hindered, and although there are a growing number of support services to help the homeless find their way off the streets, more services are needed. The latest homeless count in the project area was completed by the Data and Research Unit of the Los Angeles Homeless Services Authority. See *Table 1- Homeless Population Count* for the homeless population count prepared by this Unit on March 8, 2019 for the census tract associated to the proposed project (Tract Number 1882.01) and for various radii from the site (Reference 2, 3).

Project Area Homelessness

The recent homeless count in the project area was completed by the Data and Research Unit of the Los Angeles Homeless Services Authority. See *Table 1- Homeless Population Count* for the homeless population count prepared by this Unit on July 18, 2019 for the associated census tract (Tract Number 1882.01) of the project site and for various radii from the site (Reference 2, 3). The project area homelessness data is consistent with the Citywide data, documenting a significant homeless population presenting a danger to health, life, public safety and undue burden on essential public services as detailed further below.

Table 1 Homeless Population Count				
Homeless Population	Within Census Tract (1882.01)	Within .5 miles	Within 1.0 miles	Within 1.5 miles
Unsheltered	14	25	78	176
Sheltered	0	0	0	0
Total	14	25	78	176

III. THE PROJECT IS EXEMPT FROM CEQA BASED ON STATUTORY EMERGENCY EXEMPTION

III.A. Emergency CEQA Statutory Exemption

Public Resources Code section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (the CEQA Guidelines) § 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

(i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

(ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population. The project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

III.B. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately .0078 percent of the City’s population (Reference 4).

In 2018, homeless persons constituted 13.5 percent of LAFD’s total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (Reference 5). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Reference 6)

Los Angeles County’s Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Reference 7). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Reference 8).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as “Part 1 Crimes.”) (Reference 9) This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, but is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Reference 10). These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Reference 11). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Reference 12). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Reference 13).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Reference 14). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDS Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Reference 15).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Reference 16).

III.C. Unexpected and Sudden Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Reference 17). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led to adoption of AB 1197, an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

Among other responses to homelessness, on April 17, 2018 the Mayor and City Council of the City of Los Angeles declared a Homeless shelter crisis (Reference 18). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a four percent overall decrease in the number of persons experiencing homelessness in LA County (Reference 19).

Table 2 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary at Reference 19.

Table 2 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these ongoing efforts and the initial progress shown in 2018, the 2019 Homeless Count, released in June 2019, unexpectedly has documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in Reference 19 *Table 3 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Reference 19:

Table 3 2019 Homeless Count Data Summary		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	5% Increase
Unsheltered Homeless	27,221	19% Increase
Total Homeless Persons	36,165	16% Increase

The unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified in 2019, and attendant identified dangers to health, life, property and burden on public resources present an emergency situation as defined by CEQA.

III.D. The Project is Exempt from CEQA Because it is Designed to Mitigate an Emergency

Homelessness, as documented above, itself presents a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services, meeting the definition of emergency provided by Public Resources Code section 21060.3. Homeless populations themselves suffer from adverse health impacts greater than the non-homeless population, including greater risk of death. Homeless individuals impose outsized impacts upon and use public safety and public health resources compared to the general population. The project is designed to mitigate all of these dangers.

The 2019 increase in homelessness in the City was both sudden and unexpected, further meeting the CEQA definition of an emergency set forth at Section 21060.3. Prior to June 2019, homelessness had been decreasing following County and City efforts, showing that the June 2019 dramatic increase in homeless persons was both unexpected and sudden. Moreover, CEQA Guideline section 15269(c) clarifies that a project to prevent a future emergency – such as the project which is designed to mitigate the impacts caused by the spike in homelessness -- need not be sudden or unexpected to qualify as statutorily exempt from CEQA compliance.

Finally, the fact that Section 21060.3 defines an emergency to include events beyond natural or geologic emergencies such as riots, accidents, or sabotage, shows that the dramatic increase of the already large Los Angeles-area homeless population is the type of emergency exempt from CEQA environmental review. The dramatic increase in homelessness identified in June 2019 and the attendant significant adverse public health, safety, and welfare impacts that are associated with homelessness would also be exacerbated by delaying the project in order to conduct a CEQA environmental review. The City's approval of the project to mitigate the unexpected and dramatic surge in homelessness is the type of emergency situation the legislature intended to fall outside the scope of CEQA review when it adopted Section 21080(b)(4). For these reasons, the project is statutorily exempt from compliance with CEQA as a specific action necessary to mitigate an emergency.

REFERENCES

1. City of Los Angeles, Bureau of Engineering. *Master Specification, General Requirements, Section 01562, Part 1.1.C.*
2. Los Angeles Homeless Services Authority. *Search of Homeless Population Density for Riverside Dr Bridge Home*, by Eileen Schoetzow August 30, 2019.
3. Los Angeles Homeless Services Authority. Online search of LAHSA statistics for Area, by Eileen Schoetzow, LABOE, August, 2019.
4. (March 26, 2019, Declaration of Los Angeles Fire Department Battalion Chief and Paramedic Douglas Zabalski, paragraph 8; *Greater Los Angeles Homeless Count – Data Summary*, Los Angeles Homeless Services Authority, July 23, 2018.
5. March 26, 2019, Declaration of Los Angeles Fire Department Battalion Chief and Paramedic Douglas Zabalski, paragraph 8.
6. Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, *Evaluation of Housing for Health Permanent Supportive Housing Program*. Santa Monica, CA: RAND Corporation, 2017. https://www.rand.org/pubs/research_reports/RR1694.html, p. 2; Hwang SW, Chambers C, Chiu S, *et al.* A comprehensive assessment of health care utilization among homeless adults under a system of universal health insurance. *Am J Public Health*. 2013;103 Suppl 2(0 2):S294–S301. doi:10.2105/AJPH.2013.301369).
7. Wu, Fei, and Max Stevens, *The Services Homeless Single Adults Use and Their Associated Costs: An Examination of Utilization Patterns and Expenditures in Los Angeles County over One Fiscal Year*, Los Angeles, Calif.: County of Los Angeles, 2016.
8. Salit, Sharon A., M.A., *et al.* *Hospitalization Costs Associated with Homelessness in New York City*, New England Journal of Medicine, June 11, 1998.
9. March 23, 2019 Declaration of Los Angeles Police Department Commander Dominic H. Choi, Pg 6.
10. January 10, 2018, Assessment of Grave Disability, Los Angeles County Department of Mental Health, p. 3).
11. Barrow ,Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, *Mortality Among Homeless Shelter Residents in New York City*, American Journal of Public Health, April 1999, Vol. 89, No. 5.)
12. Hibbs, Jonathan R., MD, *et. al.*, *Mortality in a Cohort of Homeless Adults in Philadelphia*, New England Journal of Medicine, August 4, 1994.)
13. Morrison, David S., *Homelessness as an Independent Risk Factor for Mortality: Results from a Retrospective Cohort Study*, International Journal of Epidemiology, March 21, 2009.)

14. Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, *The Unmet Health Care Needs of Homeless Adults: A National Study*. American Journal of Public Health, July 2010, Vol 100, No. 7.)
15. Schwarcz, Sandra K, Ling C Hsu,, Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, *Impact of housing on the survival of persons with AIDS*, BMC Public Health, July 7, 2009, available at <http://www.biomedcentral.com/1471-2458/9/220>.)
16. Baggett, Travis P et al., *Disparities in Cancer Incidence, Stage, and Mortality at Boston Health Care for the Homeless Program*. American Journal of Preventive Medicine, vol. 49, 5 (2015): 694-702. doi:10.1016/j.amepre.2015.03.038 available at the PubMed Central (PMC) archive of biomedical and life sciences journal literature at the U.S. National Institutes of Health's National Library of Medicine, at <https://www.ncbi.nlm.nih.gov/pubmed/26143955>.)
17. Hunter, Sarah B., Melody Harvey, Brian Briscoombe, and Matthew Cefalu, *Evaluation of Housing for Health Permanent Supportive Housing Program*. Santa Monica, CA: RAND Corporation, 2017. https://www.rand.org/pubs/research_reports/RR1694.html, p. 1.)
18. Council File No. 19-0126.
19. *Greater Los Angeles Homeless Count – Data Summary*, Los Angeles Homeless Services Authority (“LAHSA”), September 3, 2019.

ATTACHMENTS

Attachment A – Fault Rupture Hazard Investigation, August 2019

Attachment B – LADBS Geology Report Approval Letter, October 2019



Project No. A8950-06-17
August 8, 2019

Mr. Patrick J. Schmidt, PE, GE
City of Los Angeles
Geotechnical Engineering Division
1149 S. Broadway, Suite 120
Los Angeles, CA 90015-2213

Subject: **Preliminary Findings
Fault Rupture Hazard Investigation
3210-3248 Riverside Drive Bridge Home And Senior Recreation Center Project
W.O.# E1908495, Ged File No. 19-033, TOS 19-033
Contract No. C-130601**

Dear Mr. Schmidt:

We are currently performing a fault rupture hazard investigation in accordance with our proposal dated April 29, 2019. We have completed our field exploration program and preliminary stratigraphic analysis of the boring data to evaluate the presence of active faults at the Riverside Bridge Home and Senior Recreation Center project. This letter provides a summary of our preliminary findings and presents our preliminary conclusions regarding the potential for surface fault rupture at the site.

BACKGROUND

The California Geological Survey (CGS) has established an Alquist-Priolo Earthquake Fault Zone for the active Hollywood Fault, part of a system of east trending reverse, oblique-slip, and left-lateral strike-slip faults that extend for 200 kilometers along the southern boundary of the Transverse Ranges. Geomorphic observations indicate that the Hollywood Fault extends for approximately 8.4 miles from the Los Angeles River area in a westerly direction along the base of the Santa Monica Mountains through downtown Hollywood to northwestern Beverly Hills. The Hollywood Fault is thought to dip steeply to the north separating Cretaceous age granitic and Miocene age sedimentary and volcanic bedrock units on the north from Quaternary age alluvial sediments to the south. The main strand of the Hollywood fault zone, as interpreted by CGS, is located approximately 300 feet north of the proposed Riverside Bridge Home and Senior Recreation Center project.

Based on information provided by the City of Los Angeles Bureau of Engineering (BOE), the City is planning to construct a temporary homeless housing facility (THHF) and a senior recreation center (SRC). The improvements associated with the THHF include a “Sprung” tent-like structure, which will be used as the main housing area, administration and hygiene trailers, a patio, paved areas and a ramp. The “Sprung” structure will be supported on a permanent foundation. A single-story SRC is also proposed for the future and will be located on the south side of the THHF.

The northern portion of the proposed Riverside Bridge Home and Senior Center Project is located within the limits of a state-designated APEFZ for surface fault rupture hazards associated with the Hollywood Fault. Specifically, the Sprung Structure, Hygiene Trailer and the Administrative Trailer and the northern portion of the Senior Recreation Center is located within the limits of the APEFZ. In compliance with the Alquist-Priolo Act, the Los Angeles Department of Building and Safety (LADBS) Grading Division requires a site-specific subsurface fault investigation be performed for proposed habitable structures within an APEFZ for the purpose of demonstrating the suitability of the site for development or, if faults are identified, to determine the location and activity of faults impacting the project and to provide recommendations for mitigation of the hazard of surface fault rupture (in compliance with the Alquist-Priolo Act and LADBS Information Bulletin P/BC 2017-129).

Prior fault rupture hazard investigations performed for the Northeast Interceptor Sewer (NEIS) 2A project identified faults in the vicinity of the proposed structures. The scope of the current fault investigation was designed to evaluate the location and age of these and other secondary faults that may traverse the portion of the site located within the APEFZ. Since the location of the proposed structures may change from those currently proposed, the explorations were intended to cover the entire project area and the area 50 feet to the north of the project boundary (in compliance with the Alquist-Priolo Act and LADBS Information Bulletin P/BC 2017-129). This will provide maximum shifting of proposed structures anywhere within the property/project boundary. Figure 1, Site Plan, shows the locations of the proposed structures and the boundary of the APEFZ.

FIELD INVESTIGATION

To evaluate the potential for surface fault rupture that may impact the proposed structures, we performed a field investigation that included two phases of drilling along two exploration transects. Transect A, completed on June 21, 2019 consisted of drilling 12 continuous-core hollow-stem auger borings. A second phase of drilling was initiated to provide additional information to clarify apparent offsets of geologic units potentially caused by faulting between two borings located along Transect A. In addition, five borings were drilled along a second exploration transect, designated as Transect B, to define the trend of the apparent zone of faulting. The second phase of drilling was completed on July 25, 2019.

A total of eighteen continuous-core borings were drilled within the property and the adjacent LADWP property along the northern property boundary. The borings were spaced approximately 8 to 28 feet apart and drilled to depths ranging from approximately 29 to 35 feet beneath the existing ground surface. The location of the exploration transects and the borings are shown on Figure 1.

The borings along both transects encountered similar stratigraphy that included artificial fill and Holocene age alluvium to a depth of approximately 9 to 15 feet beneath the existing ground surface. The Holocene age sediments are underlain Pleistocene age alluvium that is in turn underlain by sedimentary bedrock of the Puente Formation. The bedrock was encountered at depths ranging from 20.9 to 26.3 feet beneath the existing ground surface. Static groundwater levels in the explorations ranged from approximately 14.4 to 26.7 feet beneath the existing ground surface.

STRATIGRAPHIC ANALYSIS AND RELATIVE AGE DATING

The CGS, as specified in the Alquist-Priolo Earthquake Fault Zoning Act (CGS, 2018), defines a Holocene-active fault as those that have had surface displacement within Holocene time (about the last 11,700 years). Therefore, it is important to establish the relative age of the sediments at the site, particularly if they are suspected to be affected by faulting, to establish the age of the potential faults.

We assessed the relative age of the sediments encountered in the continuous-core borings based on soil stratigraphy, the degree of weathering of the parent material, and the degree of secondary soil development. Detailed secondary soil descriptions were documented for the entire depth of borings CC-1, CC-2, CC-6, CC-10, CC-12, CC-22, CC-23, and CC-25. Summary descriptions were documented for remainder of the borings. The soil descriptions record diagnostic pedogenic features for each soil horizon identified. This was performed to evaluate the relative age of the sediments beneath the site for the purpose of establishing stratigraphic correlations between the borings and to constrain the age of faulting, if observed. The relative age estimates are considered minimum ages given that an unknown amount of erosion has occurred after the formation of the unit and before the burial of each truncated surface and buried soil studied.

PRELIMINARY FINDINGS

We performed a detailed stratigraphic analysis utilizing the recovered core samples from the borings for the purpose of identifying well-defined sediment layers that are laterally continuous and vertically well-defined between explorations. Our stratigraphic analysis included comparison of the primary stratigraphy and secondary soil horizons to develop a detailed cross section of the subsurface stratigraphy.

The results of the detailed stratigraphic analysis indicate that the top of the Pleistocene age sediments ranges from approximately 9 to 15 feet below the existing ground surface. The thickness of the Pleistocene age sediments is approximately 10½ to 14½ feet. The stratigraphically lowest geologic unit, directly above the Miocene age Puente Formation bedrock, is estimated to have a minimum age of approximately 19,000 to 46,000 years old.

Based on our stratigraphic analysis, there are at least three distinct Holocene age geologic units and at least four distinct Pleistocene age geologic units that are laterally traceable and continuous across the area explored. These distinct geologic units can be correlated with a high degree of confidence across the majority of the two exploration transects. However, between CC-10 and CC-13 on Transect A and between CC-23 and CC-25 on Transect B, the geologic units do not correlate and are interpreted to be offset by faulting.

The interpreted magnitude of offsets of various distinct geologic units range from approximately 1 to 4 feet. These displacements represent minor offset along a secondary strand of the fault. The main strand of the fault is located approximately 300 feet north of this observed secondary strand. Additional review of the core samples is being performed to further refine our interpretation.

CONCLUSIONS

Based on our stratigraphic analysis, it is our opinion that a zone of secondary Holocene-active faults is present along the northern site boundary. Based on our preliminary findings, the interpreted zone of faulting is well-constrained and the area south of this zone of secondary faulting contains multiple laterally continuous Pleistocene soil units that are not offset or deformed by tectonic processes. It is with a high degree of confidence that the area south of the fault zone is free of active faulting.

In accordance with the requirements of the Alquist-Priolo Act, structures intended for human occupancy shall not be sited over the trace of an active fault. Therefore, we recommend that a structural set-back (no-build zone) be implemented for the proposed habitable structures at the site to mitigate the hazard of surface fault rupture. Because of the well-constrained location and orientation of the fault zone, we recommend that a structural set-back of 25 feet be implemented for the proposed habitable structures at the site. Figure 2, Structural Setback Plan, illustrates the recommended structural setback from the southern boundary of the fault zone. It should be noted that the limits of the fault zone and recommended structural setbacks are still preliminary (as of the date of this letter) and may be subject to modification.

A comprehensive report is currently being prepared which will be suitable for submittal to the local building official and your design professionals.

Should you have any, please contact the undersigned at your convenience.

Very truly yours,

GEOCON WEST, INC.



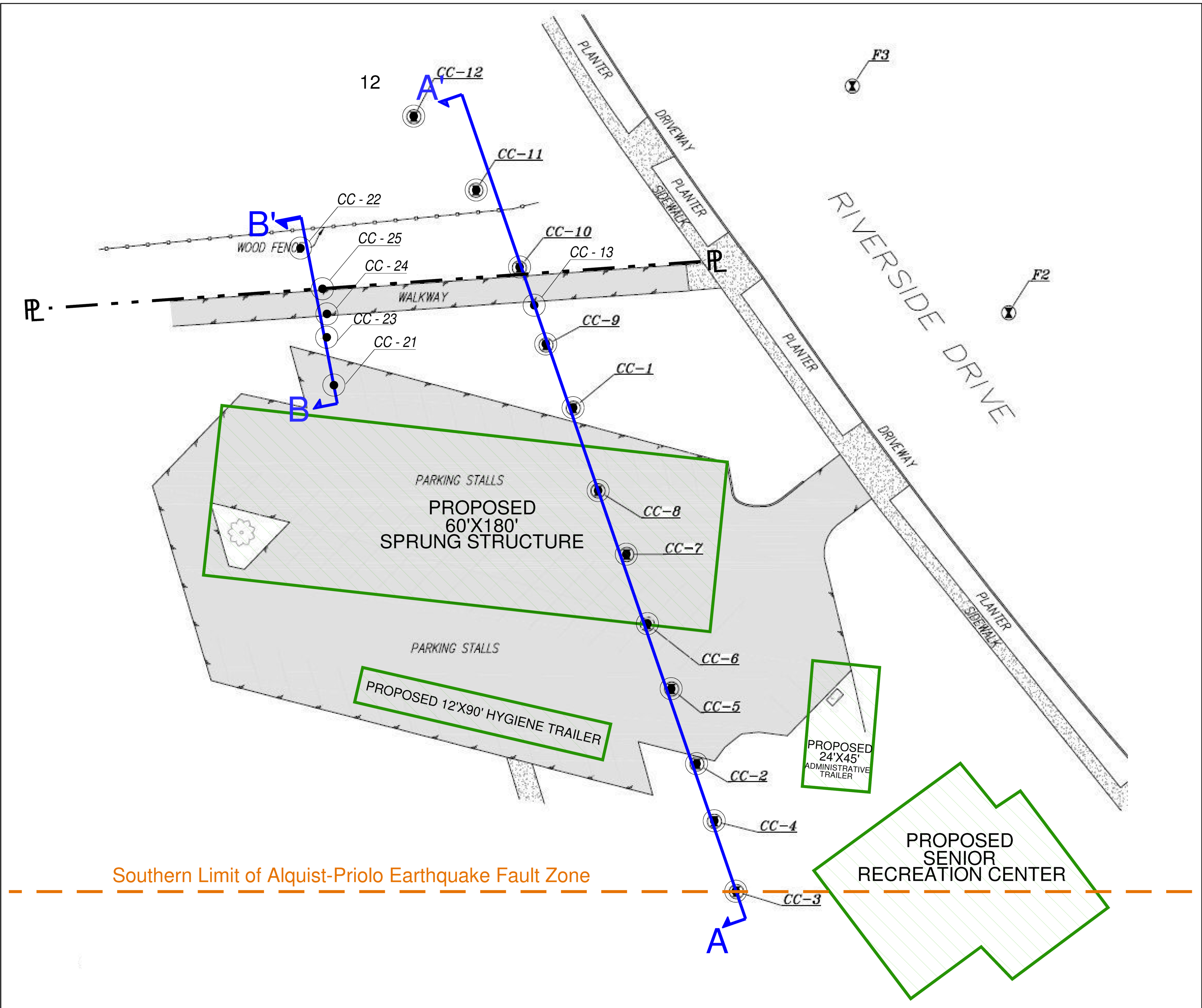
Susan Kirkgard, CEG 1754
Senior Geologist



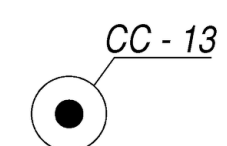
Gerald Kasman, CEG 2251
Senior Geologist

Enclosures: Figure 1, Site Plan
Figure 2, Structural Setback Plan

(EMAIL) Addressee



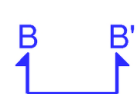
LEGEND



Location of Continuous Core Boring and Number
(GEOCON 2019)

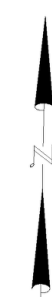


Location of Proposed Structures



Location of Geologic Sections

DRAFT



SCALE (H&V): 1" = 20'



GEOCON
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ENVIRONMENTAL GEOTECHNICAL MATERIALS
3303 N. SAN FERNANDO BLVD. - SUITE 100 - BURBANK, CA 91504
PHONE (818) 841-8388 - FAX (818) 841-1704

DRAFTED BY: CB/RA

CHECKED BY: GAK

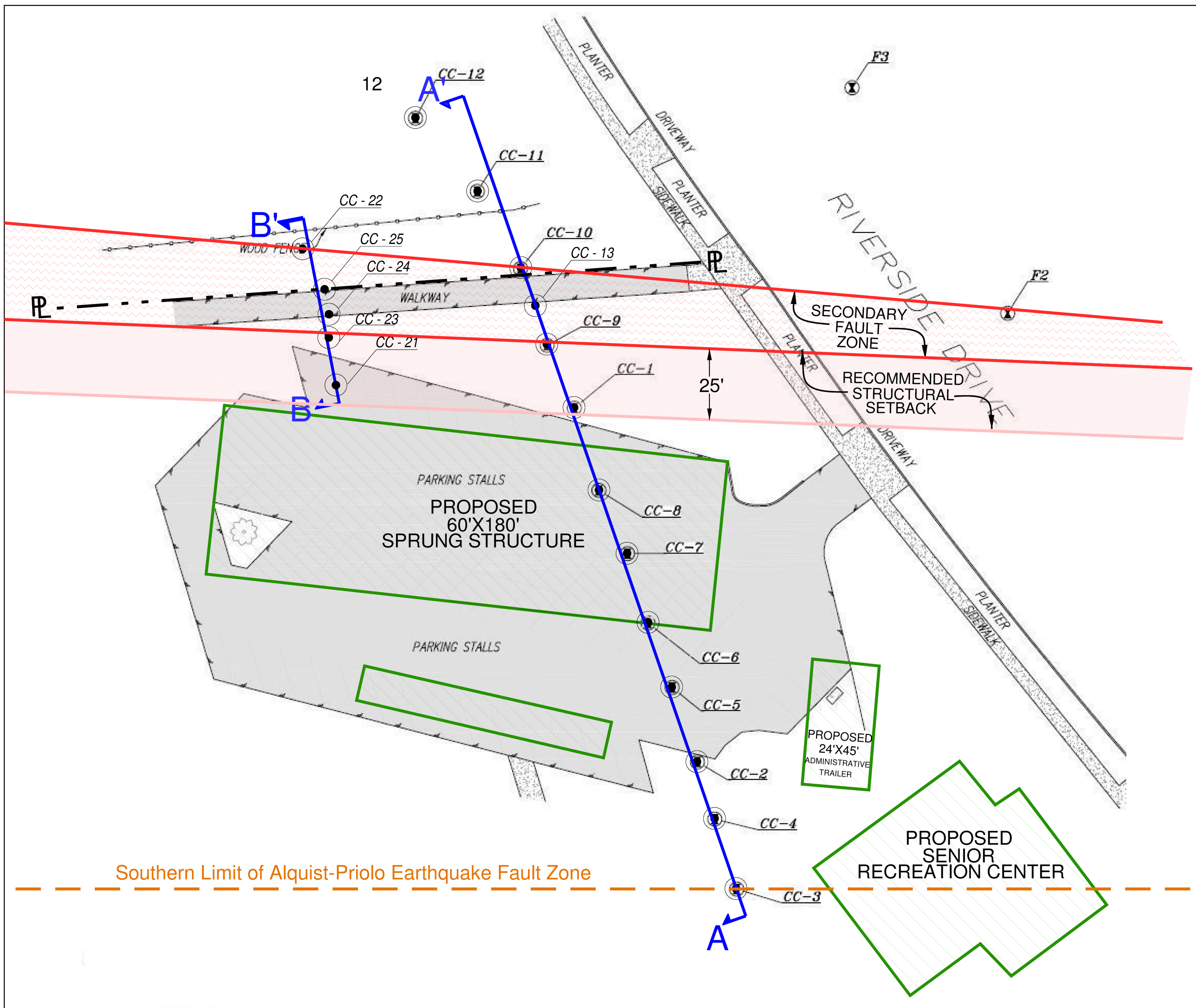
SITE PLAN

BUREAU OF ENGINEERING
BRIDGE HOME AND
SENIOR RECREATION CENTER

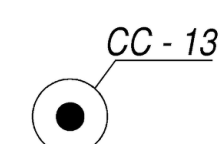
AUGUST 2019

PROJECT NO. A8950-06-17

FIG. 1



LEGEND



Location of Continuous Core Boring and Number (GEOCON 2019)

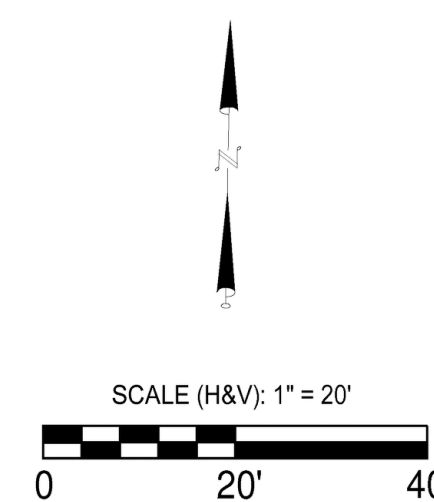


Location of Proposed Structures



Location of Geologic Sections

DRAFT



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STRUCTURAL SETBACK PLAN

BUREAU OF ENGINEERING
BRIDGE HOME AND
SENIOR RECREATION CENTER

AUGUST 2019 PROJECT NO. A8950-06-17 FIG. 2

BOARD OF
BUILDING AND SAFETY
COMMISSIONERS

VAN AMBATIELOS
PRESIDENT

E. FELICIA BRANNON
VICE PRESIDENT

JOSELYN GEAGA-ROSENTHAL
GEORGE HOVAGUIMIAN
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CITY OF LOS ANGELES
CALIFORNIA



ERIC GARCETTI
MAYOR

DEPARTMENT OF
BUILDING AND SAFETY
201 NORTH FIGUEROA STREET
LOS ANGELES, CA 90012

FRANK M. BUSH
GENERAL MANAGER
SUPERINTENDENT OF BUILDING

OSAMA YOUNAN, P.E.
EXECUTIVE OFFICER

GEOLOGY REPORT APPROVAL LETTER

October 10, 2019

LOG # 110145
SOILS/GEOLOGY FILE - 2
AP

City of Los Angeles
1149 S. Broadway, 8th Floor
Los Angeles, CA 90015

TRACT(S): Ivanhoe (MR 17-65/68)
BLOCK: 3
LOT(S): 33-34
LOCATION: 3210-3248 Riverside Drive

CURRENT REFERENCE <u>REPORT/LETTER(S)</u>	REPORT <u>No.</u>	DATE OF <u>DOCUMENT</u>	<u>PREPARED BY</u>
Addendum Report	19-033	10/07/2019	DPW-BEO-GED
Oversized Documents	"	"	"
Addendum Report	19-033	09/03/2019	DPW-BEO-GED
Geology Report	A8950-06-17	09/03/2019	Geocon West, Inc.
Oversized Documents	"	"	"

The Grading Division of the Department of Building and Safety has reviewed the referenced reports that presents a geologic fault investigation for a proposed temporary homeless shelter (Bridge Home) and senior recreation center. According to the 10/07/2019 report, habitable structures for the proposed project include a hygiene trailer, an administrative trailer, a sprung structure and a senior recreation center. The investigation by Geocon West, Inc. (GWI), was reviewed and accepted by the Geotechnical Division of the Bureau of Engineering of the Department of Public Works (GED).

The site is located within the Official Earthquake Fault Zone that was established by the California Geological Survey for the Hollywood fault. The investigation consisted of two transects of continuous core borings (13 boring in transect A and 5 borings in transect B). The depth of exploration was up to 35 feet below the ground surface. Beneath a layer of artificial fill, Holocene alluvial deposits were found to overlie Pleistocene age alluvium, which overlies Miocene age sedimentary bedrock. An attached soil stratigraphy report (to the GWI report) by John Helms describes pedological development of several buried soil horizons, which indicate the Pleistocene deposited are about 30,000 to 45,000 years old. Based on displacement of marker beds observed in the borings, a fault zone was identified at the northern part of Transect A. The continuity of marker beds indicated the absence of faulting in the southerly part of the site. Transect B was

placed to determine the trend of the fault zone, which is roughly east-west in orientation. A setback of 25 feet from the southerly edge of the fault zone is recommended for the proposed habitable structures. The report addendum report by the GED, dated 10/07/2019, shows the location of the habitable structures relative to the recommended setback area from the identified fault zone.

The referenced reports are acceptable, provided the following condition is complied with during site development:

1. The proposed habitable structures shall be placed outside of the recommended setback area, as shown the revised Figure 10 of the GED 10/07/2019 addendum report. Such placement shall be verified by the project engineering geologist (GED) during construction of the project.



DANIEL C. SCHNEIDERREIT
Engineering Geologist II

Log No. 110145
213-482-0480

cc: GED, Project Consultant
LA District Office